United States Environmental Protection Agency Washington, D.C. 20460

OMB Approval 2070-174

DATA CALL-IN RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address

KMG-BERNUTH, INC
9555 W. SAM HOUSTON PKWY SOUTH, SUITE 600
HOUSTON, TX 77099

2. Case # and Name

2505 Pentachlorophenol
Chemical # and Name 063001
Pentachlorophenol

3. Date and Type of DCI and Number

21-Sep-2011
PRODUCT SPECIFIC
ID # PDCI-063001-30215

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
61483-1		N.A.	N.A.		
61483-2		N.A.	N.A.		
61483-3		N.A.	N.A.		
61483-58		N.A.	N.A.		
61483-59		N.A.	N.A.		

8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.

Signature and Title of Company's Authorized Representative_____

9. Date

10. Name of Company

11. Phone Number

United States Environmental Protection Agency Washington, D.C. 20460

OMB Approval 2070-174

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address

KMG-BERNUTH, INC
9555 W. SAM HOUSTON PKWY SOUTH, SUITE 600
HOUSTON, TX 77099

2. Case # and Name

2505 Pentachlorophenol

EPA Reg. No. 61483-58

3. Date and Type of DCI and Number

21-Sep-2011
PRODUCT SPECIFIC
ID # PDCI-063001-30215

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
	Product Chemistry Data Requirements (Antimicrobial)									
830.1550	Product Identity and composition	(1)	N				BB	EP; MP; TGAI	8	
830.1600	Description of materials used to produce the product	(2)	N				BB	EP; MP; TGAI	8	
830.1620	Description of production process	(3)	N				BB	TGAI	8	
830.1650	Description of formulation process	(4)	N				BB	EP; MP	8	
830.1670	Discussion of formation of impurities	(5)	N				BB	EP; MP; TGAI	8	
830.1700	Preliminary analysis	(6 ,14 ,15)	N				BB	TGAI	8	
830.1750	Certified limits	(7)	N				BB	EP; MP; TGAI	8	
830.1800	Enforcement analytical method	(8)	N				BB	EP; MP; TGAI	8	
830.6302	Color	(16)	N				BB	EP; MP; TGAI	8	
830.6303	Physical state	(17)	N				BB	EP; MP; TGAI	8	
830.6304	Odor	(18)	N				BB	EP; MP; TGAI	8	

10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law

Signature and Title of Company's Authorized Representative_____

11. Date

12. Name of Company

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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1. Company Name and Address

KMG-BERNUTH, INC
9555 W. SAM HOUSTON PKWY SOUTH, SUITE 600
HOUSTON, TX 77099

2. Case # and Name

2505 Pentachlorophenol

EPA Reg. No. 61483-58

3. Date and Type of DCI and Number

21-Sep-2011
PRODUCT SPECIFIC
ID # PDCI-063001-30215

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
				1	2	3				
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	(9 ,19 ,20)	N				BB	TGAI	8	
830.6314	Oxidizing or reducing action	(21)	N				BB	EP; MP	8	
830.6315	Flammability	(22)	N				BB	EP; MP	8	
830.6316	Explodability	(23)	N				BB	EP; MP	8	
830.6317	Storage stability	(10)	N				BB	EP; MP	16	
830.6319	Miscibility	(24)	N				BB	EP; MP	8	
830.6320	Corrosion characteristics	(11)	N				BB	EP; MP	16	
830.6321	Dielectric breakdown voltage	(25)	N				BB	EP; MP	8	
830.7000	pH	(26 ,27)	N				BB	EP; MP; TGAI	8	
830.7050	UV/Visible absorption		N				BB	PAI; TGAI	8	
830.7100	Viscosity	(28)	N				BB	EP; MP	8	
830.7200	Melting point/melting range	(29 ,30)	N				BB	TGAI	8	

Initial to indicate certification as to information on this page (full text of certification is on page one).

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United States Environmental Protection Agency Washington, D.C. 20460

OMB Approval 2070-174

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address	2. Case # and Name	3. Date and Type of DCI and Number
KMG-BERNUTH, INC 9555 W. SAM HOUSTON PKWY SOUTH, SUITE 600 HOUSTON, TX 77099	2505 Pentachlorophenol EPA Reg. No. 61483-58	21-Sep-2011 PRODUCT SPECIFIC ID # PDCI-063001-30215

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
				1	2	3				
830.7220	Boiling point/boiling range	(31 ,32)	N				BB	TGAI	8	
830.7300	Density/relative density	(33 ,34)	N				BB	EP; MP; TGAI	8	
830.7370	Dissociation constants in water	(35 ,36)	N				BB	PAI; TGAI	8	
830.7550	Partition coefficient (n-octanol/water), shake flask method	(37)	N				BB	PAI; TGAI	8	
830.7560	Partition coefficient (n-octanol/water), generator column method	(58 ,59)	N				BB	TGAI or PAI	8	
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography	(38)	N				BB	PAI; TGAI	8	
830.7840	Water solubility: Column elution method, shake flask method	(39)	N				BB	PAI; TGAI	8	
830.7860	Water solubility, generator column method	(40)	N				BB	PAI; TGAI	8	
830.7950	Vapor pressure	(41 ,42)	N				BB	PAI; TGAI	8	
	Toxicology Data Requirements (Antimicrobial)									
870.1100	Acute Oral Toxicity	(12 ,43 ,44)	N				BB	EP; MP; TGAI	8	

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address

KMG-BERNUTH, INC
9555 W. SAM HOUSTON PKWY SOUTH, SUITE 600
HOUSTON, TX 77099

2. Case # and Name

2505 Pentachlorophenol

EPA Reg. No. 61483-58

3. Date and Type of DCI and Number

21-Sep-2011
PRODUCT SPECIFIC
ID # PDCI-063001-30215

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
870.1200	Acute dermal toxicity	(13 ,45 ,46 ,47)	N				BB	EP; MP; TGAI	8	
870.1300	Acute inhalation toxicity	(48 ,49 ,50 ,51)	N				BB	EP; MP; TGAI	8	
870.2500	Acute dermal irritation	(52 ,53 ,54 ,55)	N				BB	EP; MP; TGAI	8	
870.2600	Skin sensitization	(56 ,57)	N				BB	EP; MP; TGAI	8	
870.2400	Acute eye irritation		N				BB	EP; MP; TGAI	8	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

United States Environmental Protection
Agency Washington, D.C. 20460

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2505 Pentachlorophenol
DCI Number: PDCI-063001-30215

Key: EP; MP; TGAI = End Use Product; Manufacturing Use Product; Technical Grade Active Ingredient; PAI; TGAI = Pure Active ingredient, Technical Grade of the Active Ingredient; TGAI or PAI = Technical Grade of the Active Ingredient or Pure Active Ingredient; EP; MP = End Use Product, Manufacturing Use Product; TGAI = Technical Grade Active Ingredient [TGAI]

Use Categories Key:
BB - Wood preservatives

Footnotes: **[The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]**

1 Data must be provided in accordance with 40 CFR Part 158.320.

2 Data must be provided in accordance with 40 CFR Part 158.325.

3 Data must be provided in accordance with 40 CFR Part 158.330.

4 Data must be provided in accordance with 40 CFR Part 158.335.

5 Data must be provided in accordance with 40 CFR Part 158.340.

6 Data must be provided in accordance with 40 CFR Part 158.345.

7 Data must be provided in accordance with 40 CFR Part 158.350.

8 Data must be provided in accordance with 40 CFR Part 158.355.

9 Data on stability of the MP and TGAI to storage at normal temperatures are required. Data on the stability of the TGAI to high temperatures are required if the TGAI is expected to be subjected to temperatures >50 degrees Celsius (122 degrees Fahrenheit) during production or storage.

10 The 16-month deadline for submission of this study applies if you are conducting a new study to satisfy this requirement. You are then required to submit a progress report to the Agency within 3 months following the 90-Day response deadline for this PDCI. Further information appears on page 7 of the Generic and Product Specific Data Call-In Notice. If you intend to submit an existing study or cite previously submitted data, they must be submitted with your 90-Day Response. Alternatively, a combined, abbreviated, non-guideline, 14-day study at elevated temperatures may be conducted and, if found acceptable, may be used to replace the one-year study. Details of the test requirements are attached to this PDCI in a 2-page document entitled GUIDANCE: Combined Accelerated Storage Stability and Corrosion Characteristics Study.

11 The 16-month deadline for submission of this study applies if you are conducting a new study to satisfy this requirement. You are then required to submit a progress report to the Agency within 3 months following the 90-Day response deadline for this PDCI. Further information appears on page 7 of the Generic and Product Specific Data Call-In Notice. If you intend to submit an existing study or cite previously submitted data, they must be submitted with your 90-Day Response. Alternatively, a combined, abbreviated, non-guideline, 14-day study at elevated temperatures may be conducted and, if found acceptable, may be used to replace the one-year study. Details of the test requirements are attached to this PDCI in a 2-page document entitled GUIDANCE: Combined Accelerated Storage Stability and Corrosion Characteristics Study.

12 Diluted EP testing is required to support the end product registration if results using the EP meet the criteria for restricted use classification under 40 CFR Part 152.170(b) or special review consideration under 40 CFR Part 154.7(a)(1).

United States Environmental Protection
Agency Washington, D.C. 20460

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2505 Pentachlorophenol
DCI Number: PDCI-063001-30215

Key: EP; MP; TGAI = End Use Product; Manufacturing Use Product; Technical Grade Active Ingredient; PAI; TGAI = Pure Active ingredient, Technical Grade of the Active Ingredient; TGAI or PAI = Technical Grade of the Active Ingredient or Pure Active Ingredient; EP; MP = End Use Product, Manufacturing Use Product; TGAI = Technical Grade Active Ingredient [TGAI]

Use Categories Key:

BB - Wood preservatives

Footnotes: **[The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]**

13 Diluted EP testing is required to support the end product registration if results using the EP meet the criteria for restricted use classification under 40 CFR Part 152.170(b) or special review consideration under 40 CFR Part 154.7(a)(1).

14 Required for TGAIs and products produced by an integrated system.

15 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

16 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

17 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

18 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

19 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

20 Data on the stability to metals and metal ions is required only if the active ingredient is expected to come in contact with either material during storage.

21 Required if the product contains an oxidizing or reducing agent

22 Required when the product contains combustible liquids.

23 Required when the product is potentially explosive.

24 Required if the product is an emulsifiable liquid and is to be diluted with petroleum solvents.

25 Required if the end-use product is a liquid and is to be used around electrical equipment.

26 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

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FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

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Use Categories Key:
BB - Wood preservatives

Footnotes: **[The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]**

27 Required if the product is dispersible with water.

28 Required if the product is a liquid.

29 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

30 Required when the TGAI is solid at room temperature.

31 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

32 Required if the TGAI is liquid at room temperature.

33 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

34 True density or specific density are required for all test substances. Data on bulk density is required for MPs that are solid at room temperature.

35 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

36 Required when the test substance contains an acid or base functionality (organic or inorganic) or an alcoholic functionality (organic).

37 Required if the TGAI or PAI is organic and non-polar.

38 Required if the TGAI or PAI is organic and non-polar.

39 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

40 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

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FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

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Use Categories Key:
BB - Wood preservatives

Footnotes: **[The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]**

41 If the TGAI cannot be isolated, data are required on the practical equivalent of the TGAI (i.e., if the active ingredient is either an acid, base or ionic form, and it is formulated into salts or esters, the concentration of the active ingredient in these products must be expressed in acid equivalent or active equivalent).

42 Not required for salts.

43 Not required if test material is a gas or highly volatile.

44 For the six acute studies conducted with the end-use product, the test must be conducted using the product as formulated for sale and distribution. If the product is intended and labeled to be diluted for use, the applicant may also wish to conduct certain studies using the highest diluted concentration (i.e. lowest dilution rate) permitted by the labeling.

45 Not required if test material is a gas or highly volatile.

46 For the six acute studies conducted with the end-use product, the test must be conducted using the product as formulated for sale and distribution. If the product is intended and labeled to be diluted for use, the applicant may also wish to conduct certain studies using the highest diluted concentration (i.e. lowest dilution rate) permitted by the labeling.

47 Not required if test material is corrosive to skin or has pH < 2 or >11.5; such a product will be classified as Toxicity Category I on the basis of potential dermal toxicity.

48 For the six acute studies conducted with the end-use product, the test must be conducted using the product as formulated for sale and distribution. If the product is intended and labeled to be diluted for use, the applicant may also wish to conduct certain studies using the highest diluted concentration (i.e. lowest dilution rate) permitted by the labeling.

49 Required when the product consists of, or under conditions of use will result in, an inhalable material (e.g., gas, vapor, aerosol or particulates).

50 The 870 series studies for the MP and EP are intended to provide data on the acute toxicity of the product. Waivers for any or all of these studies may be granted when the applicant can demonstrate that the combination of inert ingredients is not likely to pose any significant human health risks. Where appropriate, the limit dose approach to testing is recommended.

51 Required when the product consists of, or under conditions of use will result in, an inhalable material (e.g. gas, volatile substances, or aerosol particulate).

52 Not required if test material is a gas or highly volatile.

53 For the six acute studies conducted with the end-use product, the test must be conducted using the product as formulated for sale and distribution. If the product is intended and labeled to be diluted for use, the applicant may also wish to conduct certain studies using the highest diluted concentration (i.e. lowest dilution rate) permitted by the labeling.

54 Not required if test material is corrosive to skin or has pH < 2 or > 11.5; such a product will be classified as Toxicity Category I on the basis of potential eye irritation effects.

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Use Categories Key:

BB - Wood preservatives

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55 Required if intended use of the antimicrobial pesticide product will involve purposeful application on human skin or will result in comparable exposure to the product (e.g. uses in swimming pool water), or if the active ingredient of the product is known or expected to be metabolized differently by the dermal route of exposure than by the oral route, and a metabolite of the active ingredient is the toxic moiety. The EP shall also be tested if any component of the EP may increase dermal absorption of the active ingredient(s) or potentiate toxic or pharmacologic effects.

56 For the six acute studies conducted with the end-use product, the test must be conducted using the product as formulated for sale and distribution. If the product is intended and labeled to be diluted for use, the applicant may also wish to conduct certain studies using the highest diluted concentration (i.e. lowest dilution rate) permitted by the labeling.

57 Required if repeated dermal exposure is likely to occur under conditions of use.

58 Required if the TGAI or PAI is organic and non-polar.

59 Data may be waived if the MP is formulated.

United States Environmental Protection
Agency Washington, D.C. 20460

LIST OF ALL REGISTRANTS SENT THIS DATA CALL-IN NOTICE

Case # and Name: 2505,Pentachlorophenol

Co. Nr.	Company Name	Agent For	Address	City & State	Zip
61483	KMG-BERNUTH, INC		9555 W. SAM HOUSTON PKWY SOUTH, SUITE 600	HOUSTON	TX 77099